



# CITY OF STOCKTON

## DEPARTMENT OF MUNICIPAL UTILITIES

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### SECOND DRAFT INTERIM PLAN

Thank you for requesting comments on the Second Draft Interim Plan. Please be aware that the City of Stockton is significantly impacted by the actions of the Delta Stewardship Council and we welcome the opportunity to work with the Council on all issues that affect Stockton, directly or indirectly.

With regard to the Second Draft Interim Plan, we have the following comments:

1. On page vi, lines 1 and 2, and again on page 16, lines 21 and 22, the draft Interim Plan notes that work processes should continue with minimal modification under the Delta Plan. While this is a laudable goal, we recommend that if significant changes are appropriate that the Delta Plan development not be hindered by those work processed begun under the Interim Plan.
2. On page 22, line 7 (Council Principals and Procedures): While we understand that the Council should not give "in concept" approvals, it should be clearly stated that compliance with Water Code Section 85212 requires the Council to review and provide timely advice to local agencies regarding the consistency of planning documents.
3. On page 6 of Appendix 1, lines 15 and 16 (Item 7 of administrative procedures governing appeals): This item notes that appeals shall be considered "filed" when the applicant's appeal is determined by staff to contain all the information listed above. We request clarification language that notes that any delay in such staff determination will not render the appeal invalid if the otherwise completely-documented appeal is submitted to the Council with 30 days (see administrative procedure 5 on page 5).

We understand the value of this Interim Plan, and look forward to the opportunity for comment on further revisions to this Plan, and in particular, the upcoming Delta Plan.

MARK J. MADISON  
DIRECTOR OF MUNICIPAL UTILITIES

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